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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

DANIEL JOSEPH, an individual, on
behalf of himself and all others similarly
situated,

Plaintiff,

v.

TRUEBLUE, INC., dba LABOR
READY, INC., and TRUEBLUE, INC.,
Washington corporations,

Defendants.

NO. 2:14-cv-00316 SMJ

**MOTION FOR ADMISSION
PRO HAC VICE**

Keith James Keogh (the "Applicant") hereby moves the Court to enter an
order permitting him to participate in this case *Pro Hac Vice* as counsel for
Plaintiff Daniel Joseph ("Plaintiff"), pursuant to Local Rule 83.2(c). In support of
this Motion, the Applicant states as follows:

MOTION FOR ADMISSION PRO HAC
VICE - 1

Case No. 2:14-cv-00316 SMJ

1 1. The Applicant is a principal of the law firm of Keogh Law, Ltd., in
2 Chicago, Illinois.

3 2. The Applicant is a member in good standing of the bars of several
4 United States federal courts, the highest state court of Illinois.

5 3. The Applicant does not reside in the State of Washington and does
6 not maintain an office in the State of Washington.

7 4. The Applicant responds to the information requested in Local Rule
8 83.2(c)(2) as follows:

9 (a) The Applicant's address and telephone number are 55 W.
10 Monroe Street, Suite 3390, Chicago, Illinois, 60603; telephone: (312) 726-1092;
11 facsimile: (312) 726-1093; email: keith@keoghlaw.com.

12 (b) The dates of admission to practice before other courts are
13 listed below:

<u>State Bar Admissions</u>	<u>Date Admitted</u>
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Illinois	May 6, 1999
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<u>Federal Bar Admissions</u>	<u>Date Admitted</u>
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Northern District of Illinois	September 10, 1999
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Southern District of Indiana	January 26, 2000
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Eastern District of Wisconsin	April 8, 2011
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District of Colorado

August 27 2012

Central District of Illinois

August 28, 2013

United States Court of Appeals
Seventh Circuit

May 9, 2000

(c) The name, address and telephone number of admitted counsel with whom the Applicant will be associated is Beth E. Terrell, of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite 300, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206) 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.

(d) The Applicant's appearance is necessary because Plaintiff in this action have retained him in this action.

(e) There are no disciplinary sanction actions pending against the Applicant and the Applicant has never been subject to any disciplinary sanctions by any court or Bar Association.

5. The Applicant understands that if he is admitted *Pro Hac Vice* he will be subject to the disciplinary jurisdiction of this Court.


6. The Applicant is familiar with the facts, issues and documents associated with this case.

7. The Applicant is familiar with the local rules of this Court.

1 WHEREFORE, Keith James Keogh, respectfully requests that the Court
2 enter an order granting the admission *Pro Hac Vice* of Keith James Keogh during
3 the pendency of this case.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Dated: 9-30-14


7 Keith James Keogh, Applicant

STATEMENT OF LOCAL COUNSEL

I, Beth E. Terrell, states that I am co-counsel for Plaintiff in this matter.

I will participate in a meaningful manner in preparation and trial of this case and am authorized and will be prepared to handle this matter, including trial, in the event that the applicant Keith James Keogh is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 1st day of October, 2014.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

By: /s/ Beth E. Terrell, WSBA #26759
Beth E. Terrell, WSBA #26759
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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on October 2, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

No Appearances

DATED this 2nd day of October, 2014.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

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